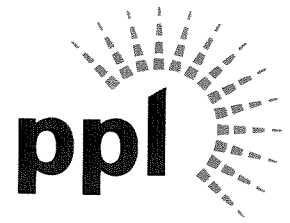


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March 3, 2006

Mr. Bob Jeffrey, Air Quality Specialist
Air Quality Policy and Planning Section
Montana Department of Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Dear Mr. Jeffrey:

In regard to the draft BART rule discussed at the 4th Visibility Stakeholders' meeting, PPL Montana offers the comments discussed below. We would appreciate DEQ's serious consideration of these views.

With respect to the question of Montana's rule being more stringent relative to the Federal rule, the discussion in the stakeholders' meeting focused on two points: 1. Inclusion of non-mandatory Class I air sheds in the assessment of visibility impairment and 2. Using a source's Potential to Emit (PTE) rather than actual emissions in modeling to measure visibility impact.

Inclusion of non – mandatory class I air sheds. EPA wrote the visibility rule to protect vistas in areas having national significance. Non-mandatory air sheds may have local significance, but do not necessarily need the same protection as mandatory Class I air sheds that Congress and EPA intended. Visibility improvements in the mandatory areas will certainly have benefits to the non-mandatory areas. Given the long timeframes envisioned by EPA to achieve the visibility goals, we feel that including non-mandatory Class I air sheds in this first phase is too aggressive.

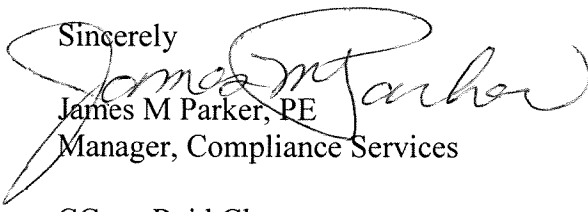
PTE versus actual emissions. It is our view that the use of PTE in modeling to determine visibility impacts will not provide as much assurance for meaningful visibility improvement as use of actual emissions in the models. Many source's actual emissions are below their PTE. Consequently, modeling with PTE results in erroneously high levels of emissions. Visibility impairment is exaggerated and the resulting required emission reductions may only reduce a source's PTE, but not actual emissions. Therefore, the desired visibility improvement may not be achieved.

Another potential area of increased stringency for the Montana rule was raised by a member of the stakeholder group. That member raised the question of enlarging the pool of BART eligible sources. PPL Montana favors this approach. Other categories of sources such as mobile sources, small construction sources, and fossil fired plants outside the BART eligibility date window

affect visibility. Applying the BART rule to these sources has much more potential of increasing the visibility benefits from this rule, than many other options.

Thank you for the opportunity to comment on the latest draft of the BART rule. Please call Mark Lambrecht or me or if you should have questions.

Sincerely



James M Parker, PE

Manager, Compliance Services

CC: Reid Clemmer
Steve Christian
Dan Gatch
Neil Dennehy
Mark Lambrecht